



NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
@NIXONPEABODYLLP

Gina M. McCreadie

Partner

T 617-345-6189

gmccreadie@nixonpeabody.com

100 Summer Street
Boston, MA 02110-2131
617-345-1000

October 1, 2015

Honorable Judge Cathy Seibel
United States District Court Judge
U.S.D.C., Southern District of New York
300 Quarropas St
White Plains, NY 10601

**RE: The Wave Studio, LLC v. Amadeus North America, Inc., et al.
S.D.N.Y. Case No. 7:15-cv-06995**

Dear Judge Seibel:

This letter is submitted on behalf of Defendant Cathay Pacific Airways LTD (“Cathay”) to request a brief extension of the deadline for Cathay to answer or otherwise respond to Plaintiff’s Complaint. Counsel for Plaintiff, The Wave Studio, LLC., has stipulated to the requested extension.

Plaintiff originally filed this action in the United States District Court for the Northern District of California (N. D. Cal. Case No. 15-cv-01364-RS). After Cathay was served with the Complaint on May 21, 2015, Plaintiff and Cathay stipulated to extend the time for Cathay to respond to the complaint on four prior occasions to enable Cathay to evaluate the allegations in the Complaint and for the parties to continue their discussions concerning a possible stipulated transfer of the action to the Southern District of New York where other related proceedings are now pending. [Dkt. Nos. 18, 30, 34 and 38]. On September 1, 2015, the parties stipulated to and the district court ordered that this matter be transferred to this Court. [Dkt. No. 40.] The case was transferred to this Court on September 4, 2015 [Dkt. No. 41], and on that date the case was referred to Your Honor as possibly related to the following case: *The Wave Studio v. General Hotel Management Ltd., et al.*, Civil Case No. 7:13-cv-09239-CS (the “*Wave Studio v. GHM matter*”), which is currently pending in this Court. We understand that as of September 9, 2015, after the instant matter was transferred to this Court, all of the other Wave Studio cases pending in this Court have been consolidated with *Wave Studio v. GHM matter*, and this case has been stayed with respect to all defendants except for GHM.

In view of the foregoing, the Defendants in the instant matter that have been served with the Complaint, including Cathay, Amadeus North America, Inc., and Priceline.com, have asked counsel for Plaintiff if Plaintiff would stipulate to consolidate this matter with *Wave Studio v. GHM matter*, and to stay the case with respect to such Defendants. As of the date of this letter, counsel for Plaintiff is still evaluating Defendants’ request. Because of the upcoming October

October 1, 2015
Page 2

NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
@NIXONPEABODYLLP

5, 2015 deadline for Cathay to respond to the Complaint, counsel for Plaintiff has agreed to extend the deadline for Cathay to answer or otherwise respond to the Complaint to October 26, 2015 to enable the parties to continue their discussions.

We are grateful for the Court's consideration.

/s/ Gina M. McCreadie

Gina M. McCreadie
of Nixon Peabody LLP